

1 Tyson C. Horrocks, Esq.
2 Nevada Bar No. 14720
3 Sydney R. Gambee, Esq.
4 Nevada Bar No. 14201
5 **HOLLAND & HART LLP**
6 9555 Hillwood Drive, 2nd Floor
7 Las Vegas, NV 89134
8 Phone: 702.669.4600
9 Fax: 702.669.4650
10 tchorrocks@hollandhart.com
11 srgambee@hollandhart.com

12 *Attorneys for Defendant TM Equities, Inc.*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 CHRISTINA CANTU and REBEKAH
16 SVINNING, on behalf of themselves and all
17 others similarly situated,

18 Plaintiffs,
19 v.

20 THOMPSON MICHIE ASSOCIATES, LLC, a
21 foreign limited liability company; TM
22 EQUITIES INC., f/k/a THOMPSON MICHIE
23 ASSOCIATES, INC., a foreign corporation;
24 DOES 1 through 50, inclusive,

25 Defendants.

26 Case No. 2:24-cv-00908 -APG-DJA

27 **STIPULATION AND ORDER
EXTENDING DEADLINE FOR
DEFENDANT TM EQUITIES INC. TO
RESPOND TO CLASS AND
COLLECTIVE ACTION COMPLAINT
(SECOND REQUEST)**

28 **STIPULATION**

29 Plaintiffs CHRISTINA CANTU and REBEKAH SVINNING, on behalf of themselves
30 and all others similarly situated (“Plaintiffs”) and Defendant TM EQUITIES INC. (“Defendant”),
31 by and through their undersigned counsel of record, hereby stipulate and agree, pursuant to LR
32 IA 6-1 and 6-2, as follows. This is the second request for the extension of this deadline.

33 1. Plaintiffs filed their Class & Collective Action Complaint and Individual
34 Complaint on April 8, 2024 (“Complaint”). ECF No. 1-2, Ex. A.

35 2. Defendant was served with the Complaint on April 15, 2024. ECF No. 1-2, Ex. D.

36 ///

37 **HOLLAND & HART LLP**
38 **9555 HILLWOOD DRIVE, 2ND FLOOR**
39 **LAS VEGAS, NV 89134**

1 3. Defendant Thompson Michie Associates, LLC removed this action to this Court
2 on Tuesday, May 14, 2024. ECF No. 1.

3 4. Defendant's response to the Complaint is currently due to be filed by May 28,
4 2024, as extended by stipulation and order. ECF Nos. 6 and 7.

5 5. Defendant and Plaintiffs hereby agree to extend the deadline for Defendant to
6 respond to the Complaint by one week, from May 28, 2024, to and including June 4, 2024.
7 Defendant reserves all defenses and objections, and Defendant and Plaintiffs have agreed to a
8 separate Tolling Agreement for the limited purpose of tolling the statute of limitations for absent
9 class members with respect to FLSA claims in the Complaint, only, for the duration of the
10 extension (resulting in a total Tolling Period of two weeks, or fourteen calendar days, inclusive
11 of both requested extensions of this deadline).

12 6. This Stipulation is made to accommodate recent illness and scheduling of
13 Defendant's counsel and to allow Defendant to fully prepare its response to the Complaint, and
14 not for the purpose of delay. Therefore, good cause exists to extend the deadline for Defendant's
15 response to the Complaint.

16 **IT IS SO STIPULATED.**

17 Dated this 24th day of May, 2024.

18 **HOLLAND & HART LLP**

19 /s/ Sydney R. Gambee

20 Tyson C. Horrocks
21 Sydney R. Gambee
22 9555 Hillwood Drive, 2nd Floor
23 Las Vegas, NV 89134

24 *Attorneys for Defendant TM Equities, Inc.*

18 **RAFII & ASSOCIATES, P.C.**

19 /s/ Jason Kuller

20 Jason Kuller (12244)
21 Shay Digenan (16397)
22 1120 N. Town Center Dr., Ste. 130
23 Las Vegas, NV 89144

24 *Attorneys for Plaintiffs*

24 **ORDER**

25 **IT IS SO ORDERED.**

26 
27 **UNITED STATES MAGISTRATE JUDGE**
28 Dated: 5/28/2024